

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,	)	
a Delaware corporation; and	)	
QUALCOMM TECHNOLOGIES, INC.,	)	
a Delaware corporation,	)	
	)	
Plaintiffs,	)	C.A. No. 24-490 (MN)
	)	
v.	)	REDACTED - PUBLIC VERSION
	)	Original filing date: August 1, 2025
ARM HOLDINGS PLC., f/k/a ARM LTD.,	)	Redacted filing date: August 11, 2025
a U.K. corporation,	)	
	)	
Defendant.	)	

**PLAINTIFFS' MOTION TO COMPEL**

Pursuant to the Court's Order referring this dispute to the Special Master (D.I. 336) and the Order Relating to Procedures for Resolving Disputes Before Special Master (D.I. 350), Plaintiffs Qualcomm Incorporated and Qualcomm Technologies, Inc. ("Qualcomm") hereby move to compel Defendant Arm Holdings plc. f/k/a Arm Ltd. ("Arm") to:

- (i) produce documents responsive to RFP Nos. 27, 123, 140, and 162 concerning unredacted third-party ALAs, TLAs, and Total Access Agreements and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic numbers 2, 7 and 9;
- (ii) supplement its privilege log to identify documents and emails from between April 18, 2024 to December 16, 2024 that Arm has withheld on the basis of alleged privilege;
- (iii) produce communications between Arm and [REDACTED] improperly redacted or withheld under common interest privilege or work product immunity;
- (iv) reproduce metadata and unredact subject lines from ARMQC\_02762874, ARMQC\_02762876, ARMQC\_02762878, ARMQC\_02762879;

- (v) produce documents responsive to RFP Nos. 6, 31, 33, 67, 77, and 139 concerning information Arm provided to other ALA licenses and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic number 14;
- (vi) produce documents responsive to RFP No. 156 about Arm's decision-making and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic numbers 17 and 41;
- (vii) produce documents responsive to RFP Nos. 28, 32, and 68 concerning delivery to third parties and supplement its response to Interrogatories Nos. 1 and 5;
- (viii) produce documents responsive to RFP Nos. 42 and 102 concerning versioning practices, pricing strategies and adoption of Armv9, supplement its response to Interrogatory No. 9, and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic number 27;
- (ix) produce documents responsive to RFP No. 144 concerning licensing and development of, and pricing strategy for, Armv10, supplement its response to Interrogatory No. 3 and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic number 26;
- (x) produce documents in response to RFP No. 40, 49, 50, 51, 56, 57, and 63 concerning licensing and notice of breach of TLA [REDACTED] and supplement its response to Interrogatory No. 6; and
- (xi) produce, without responsiveness review, all non-privileged documents hitting on Arm's terms and Qualcomm's proposed search terms yielding fewer than 15,000 hits, excluding families.

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August 1, 2025

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*/s/ Jennifer Ying*

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**RULE 7.1.1 CERTIFICATION**

Pursuant to D. Del. Local Rule 7.1.1, counsel for plaintiffs met and conferred with counsel for defendant regarding the relief sought by the foregoing motion, and Arm opposes this motion.

*/s/ Jennifer Ying*

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Jennifer Ying (#5550)

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Plaintiffs,	)	
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v.	)	C.A. No. 24-490 (MN)
	)	
ARM HOLDINGS PLC., f/k/a ARM LTD.,	)	
a U.K. corporation,	)	
	)	
Defendant.	)	

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2025, the Court having considered Plaintiffs' Motion to Compel and any opposition thereto;

IT IS HEREBY ORDERED that the Motion is GRANTED;

IT IS FURTHER HEREBY ORDERED that Defendant Arm Holdings plc. f/k/a Arm Ltd. ("Arm") to:

- (i) produce documents responsive to RFP Nos. 27, 123, 140, and 162 concerning unredacted third-party ALAs, TLAs, and Total Access Agreements and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic numbers 2, 7 and 9;
- (ii) supplement its privilege log to identify any documents or emails between April 18, 2024 to December 16, 2024 withheld on the basis of alleged privilege;
- (iii) produce communications between Arm and [REDACTED] improperly redacted or withheld under common interest privilege or work product immunity;

- (iv) reproduce metadata and unredact subject lines from ARMQC\_02762874, ARMQC\_02762876, ARMQC\_02762878, ARMQC\_02762879;
- (v) produce documents responsive to RFP Nos. 6, 31, 33, 67, 77, and 139 concerning information Arm provided to other ALA licenses and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic number 14;
- (vi) produce documents responsive to RFP No. 156 about Arm's decision-making and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic numbers 17 and 41;
- (vii) produce documents responsive to RFP Nos. 28, 32, and 68 concerning delivery to third parties and supplement its response to Interrogatories Nos. 1 and 5;
- (viii) produce documents responsive to RFP Nos. 42 and 102 concerning versioning practices, pricing strategies and adoption of Armv9, supplement its response to Interrogatory No. 9, and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic number 27;
- (ix) produce documents responsive to RFP No. 144 concerning licensing and development of, and pricing strategy for, Armv10, supplement its response to Interrogatory No. 3 and provide a witness pursuant to Fed. R. Civ. P. 30(b)(6) that is prepared to testify on related topic number 26;
- (x) produce documents in response to RFP No. 40, 49, 50, 51 57, and 63 concerning licensing and notice of breach of TLA [REDACTED] and supplement its response to Interrogatory No. 6;

- (xi) produce, without responsiveness review, all non-privileged documents hitting on Arm's terms and Qualcomm's proposed search terms yielding fewer than 15,000 hits, excluding families.

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J.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on August 1, 2025, upon the following in the manner indicated:

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*/s/ Jennifer Ying*

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